

Ashland Inc.

Richmond L. Williams
Chief Legal Environmental Counsel, Law

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October 7, 2011

VIA FEDERAL EXPRESS & VIA E-MAIL (Shade.Kevin@epamail.epa.gov)

Mr. Kevin Shade, Enforcement Officer Superfund Enforcement Assessment Section (6SF-TE) U.S. EPA, Region 6 1455 Ross Avenue Dallas, TX 75202-2733

RE: Gulfco Marine Maintenance Superfund Site, Freeport, Brazoria County, Texas

Dear Mr. Shade,

The following is in response to the 104(e) Request for Information ("RFI") from the United States Environmental Protection Agency ("EPA") directed to Ashland Oil, c/o Ashland Inc. ("Ashland") regarding the Gulfco Marine Maintenance Superfund Site, 906 Marlin Avenue (also referred to as County Road 756), Freeport, Texas (the "Site").

Pursuant to our discussions, you have agreed to allow Ashland to limit the scope of its response to information involving its current and former facilities that conducted business transactions with Gulfco Inc., Gulfco Marine Maintenance, Inc, Fish Engineering and Construction, Inc., Hercules Marine Services Corporation, LDL Coastal Limited L.P., and LDL Management LLC (the "Site Entities"), for the period January 1, 1971 through December 31, 1998 (the "Relevant Time Period")

In responding to the RFI, extensive efforts were made by Ashland to obtain and review all available current and archived corporate records known to exist at this time that may contain information responsive to this RFI for the Relevant Time Period which forty years into the past. Ashland's response was prepared from information gathered from available corporate records and publicly available information. Ashland supplemented that information by consulting with current and former employees with knowledge of Ashland's facilities during the Relevant Time Period. Ashland reserves its right to supplement its responses should additional information become available.

Pursuant to Ashland's Freedom of Information Act Request ("FOIA Request") to USEPA which sought, any and all information and documents relating to Ashland's purported nexus to the Site, USEPA produced the "PRP Site Nexus Reports" prepared by CR Consulting, Inc. on behalf of the Gulfco Restoration Group, dated November 5, 2009.

Only one document included with that report references Ashland — an invoice from Galveston Laboratories to Hercules Marine, dated July 12, 1994, seeking payment of \$225.00 for performing an inspection and atmospheric tests on Barge TPT 372 per certificate number 2199, also dated July 13, 1994 (see ASH00001). Included with this document was a certificate referencing Ashland Oil as the vessel owner or agent (see ASH00002.

Ashland acquired Thomas Petroleum Transit, Inc. ("TPT"), a marine transport company, on January 17, 1968 and it became a division of Ashland Oil, Inc. However, on March 3, 1993, Ashland sold the assets of TPT, including TPT's barges, to TPT Transportation Company, a wholly owned subsidiary of Dixie Carriers, Inc. ("TPT Dixie"). Since Ashland did not own any TPT barges in 1994, the invoice cannot relate to work on a TPT barge owned by Ashland. The most logical explanation is that there was that someone looked at out of date documentation for the barge at the time of performing the services. In addition, Ashland notes that the services in question were for an inspection and atmospheric tests on the barge, which does not necessarily imply that those services resulted in the disposal of hazardous substances at the Site. In the absence of information that suggests that Ashland engaged in other transactions with the Site entities Ashland concludes that it does not have responsibility under CERCLA at the Site. ¹

GENERAL OBJECTIONS

Ashland fully incorporates by reference the foregoing general objections into each of its responses to the individual RFIs, and will therefore not restate such objections within all individual responses. Subject to, and without waiving or limiting the foregoing objections, Ashland responds to the RFI as follows.

1. Ashland objects to the RFI to the extent that it seeks information that is not in Ashland's possession, custody or control, nor could such information reasonably be expected to be available over a time period that span the Relevant Time Period. Subject to this objection, Ashland has reviewed information currently available to Ashland and relevant to the RFI. Ashland expressly states that its response to the RFI is limited by the current availability of information, and reserves the right to supplement, modify and/or amend its response if new or additional information becomes available. Additionally, Ashland does not routinely maintain documents or other information beyond timeframes specified

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¹ To further corroborate this conclusion, Ashland notes that it has been identified as a PRP at the Palmer Barge Site in Houston in connection with services provided to TPT barges by Palmer Barge while Ashland owned the TPT barges during the relevant time period.

in corporate records retention policies, or as otherwise required by law. Nevertheless, Ashland has undertaken a thorough investigation designed to identify available existing documents and/or other information in its possession, custody or control. Such available information forms the basis for Ashland's response.

- 2. Ashland objects to the RFI to the extent documents and/or information requested seek attorney/client communications, work product or any other documents or information protected from disclosure pursuant to any applicable privilege. Ashland specifically reserves all rights to assert legally recognized privileges to protect against the disclosure of information including, without limitation, the attorney-client privilege and the protection from disclosure pursuant to the work product doctrine. Ashland does not waive any such right or privilege by its response to the RFI, and hereby specifically asserts such privileges and protections as applicable. The inadvertent disclosure of privileged documents, or disclosure of documents labeled as privileged but initially deemed to be mislabeled, shall not waive any applicable privilege available to Ashland.
- 3. Based upon its review of the RFI, Ashland regards individual components of the RFI as vague or ambiguous. By way of example only, the RFI is vague or ambiguous to the extent that it does not define various terms or purports to define terms other than by their commonly understood meaning. Ashland specifically states that it has provided responses to the RFI based upon its understanding of the requests and the common usage of specific terms not otherwise defined.
- 4. Ashland further objects to the RFI to the extent that any individual request is overly broad and not reasonably calculated to lead to the revelation of relevant information pertinent to the Site, and/or that responding thereto would be unduly burdensome or expensive. In this respect, Ashland specifically objects to the RFI in that it purports to require detailed information for a time period spanning thirteen to forty years ago.
- 5. Ashland objects to the extent that the RFI, including the "Instructions" contained therein, purports to impose on Ashland obligations beyond those required under Section 104(e).

Nothing in this response is intended to waive, restrict or otherwise impair any arguments or defenses to CERCLA liability or otherwise, and Ashland hereby expressly preserves its right and ability to raise any and all such arguments and defenses.

RESPONES TO REQUESTS FOR INFORMATION

1. Provide the legal name and mailing address of the Ashland.

Response:

Ashland Inc. 50 E. RiverCenter Blvd. Covington, KY 41012 Ashland.com

2. Identify and provide the full name, title, business address, and business telephone number for each person answering these questions on behalf of the Ashland, and each person(s) that was relied on or consulted with in the preparation of the answer.

Response:

Richmond L. Williams
Chief Counsel, Environmental Litigation
Ashland Inc.
1313 N. Market Street
Wilmington, DE 19894
rlwilliams@ashland.com
302.594.7020

Mary A. Donahue Senior Environmental Paralegal Ashland Inc. 5200 Blazer Parkway Dublin, Ohio 43017 madonahue@ashland.com 614.790.3319

 If Ashland wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, and telephone number.

Response:

Richmond L. Williams
Chief Counsel, Environmental Litigation
Ashland Inc.
1313 N. Market Street
Wilmington, DE 19894
rlwilliams@ashland.com
302.594.7020

Mary A. Donahue Senior Environmental Paralegal Ashland Inc. 5200 Blazer Parkway Dublin, Ohio 43017 madonahue@ashland.com 614.790.3319

4. Identify and include a brief description of the nature, timeframe(s) and status of the Ashland's business relationships with Gulfco Inc., Gulfco Marine Maintenance, Inc., Fish Engineering and Construction, Inc. Hercules Marine Services Corporation, LDL Coastal Limited L.P., LDL Management LLC, and any other previous or current owner or operator of the Site.

Response:

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time, review of publicly available information, and consulting with current and former employees, it has not located any records or information that would suggest that Ashland had any business relationship with Gulfco Inc., Gulfco Marine Maintenance Inc., Fish Engineering and Construction, Inc., Hercules Marine Services corporation, LDL Coastal Limited L.P. or LDL Management LLC during the Relevant Time Period.

- 5. Identify all transactions with the Site owners and/or operators of the Site that resulted in materials being sent to the Site by you for any purpose, including but not limited to barge cleaning. Identify and provide all documents related to each transaction, including but not limited to invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose for the transaction;

Response:

See Ashland's response to Question No. 4.

b. A description of the materials involved, including their quantity and chemical content and characteristics;

Response:

See Ashland's response to Question No. 4.

c. Any amounts paid by you in connection with each transaction;

Response:

See Ashland's response to Question No. 4.

d. The date of each transaction; and

Response:

See Ashland's response to Question No. 4.

e. The date the materials were sent to the Site.

Response:

See Ashland's response to Question No. 4.

- 6. Identify all persons, including the Ashland, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous wastes (materials) from various facilities to the Site. This information shall identify and state, but not limited to the following:
 - a. The persons with whom the Ashland made such arrangements:

Response:

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time, review of publicly available information, and consulting with current and former employees, it has not located any records or information regarding any persons, including Ashland, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials, hazardous materials, hazardous substances, and/or hazardous waste (materials) at the Site.

b. The precise locations from which these materials originated;

Response:

See Ashland's response to Question No. 4.

c. The nature, including the chemical content, characteristics, physical state (e.g., solid or liquid) and quantity (e.g., volume or weight) of all materials involved in each such arrangement;

Response:

See Ashland's response to Question No. 4.

d. All tests, analyses, analytical results, and manifests concerning each material involved in such transactions:

See Ashland's response to Question No. 4.

Response:

e. The persons who selected the location to which the materials were to be disposed and/or treated. In particular, the persons who selected the Site as a location for disposal and/or treatment of the materials. This information shall include where these persons intended to have the materials involved in each arrangement treated or disposed and all evidence of their intent;

Response:

See Ashland's response to Question No. 4.

f. The amount paid in connection with each such arrangement, the method of payment, and the identity of the persons involved in each payment transaction; and

Response:

See Ashland's response to Question No. 4.

g Provide contracts or other documents reflecting such arrangement for transportation, disposal, and/or treatment of materials.

Response:

See Ashland's response to Question No. 4.

7. Identify the corporate relationship(s) (such as successor by name change, successor by merger, etc.) between the named recipient of this request and its related entities as named at the time materials were sent by Ashland to the Site. Provide the corporate records which document that corporate relationship[s], including but not limited to documents related to mergers, acquisitions, sales, and assignments of liability.

Response:

See Ashland's response to Question No. 4.

8. List all federal, state, and local permits, identification numbers, and/or registrations issued to the Ashland's operation for the storage, transport, and/or disposal of materials. Include respective permit numbers.

Response:

See Ashland's response to Question No. 4.

 Provide names and addresses for all carriers who transported materials on behalf of Ashland to hazardous waste treatment, storage, or disposal facilities permitted by EPA or the State.

Response:

See Ashland's response to Question No. 4.

- 10. Identify whether a Notification of Hazardous Waste Activity was ever filed with EPA or the corresponding agency or official of the State. This information shall include, but not be limited to the following:
 - a. The date of such filing;

Response:

See Ashland's response to Question No. 4.

b. The wastes described in such notice;

Response:

See Ashland's response to Question No. 4.

c. The quantity of the wastes described in such notice; and

Response:

See Ashland's response to Question No. 4.

d. The identification number assigned to such facility by EPA or the State.

Response:

See Ashland's response to Question No. 4.

11. Identify all federal, state, and local offices and agencies to which Ashland has sent or filed hazardous substance or hazardous waste information and state the years during which such information was sent or filed.

Response:

See Ashland's response to Question No. 4.

In replying to this RFI, Ashland has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of the RFI or any other matter. If you have any questions concerning any response herein, please contact me.

Sincerely,

Richmond L. Williams

R.f. Wile.

Chief Counsel, Environmental Litigation

RLW/mad

Enclosures

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PH. 409-762-3111 P.O. BOX 1031 GALVESTON, TX 77553

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| SAFE FOR WORKERS: Means that in the compertment or space so designated (e) the oxygen content of the streaghters are within permissible concentrations; and that, (c) the residues are not capable of producing trace-mistrals under existing atmospheric conditions white maintal as directed on the Marine Channel's Calmellicate. NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Sate for Workers have not been met. SAFE FOR WORKERS: Means that in any compartment or space so designated, every for work may be read only if conditions of proper protective equipment, clothing, then are as specified. SAFE FOR HOT WORK. Means that in the competition of capable of conditions of proper protective equipment, clothing, then are as specified. SAFE FOR HOT WORK. Means that in the competition of inerted so or where seasonal not work is to be performed, and that, (b) the concentration of flammable in the atmosphere is below 10 percent of the lower flammable limit; and (c) the residues are not capable of producings implies concentration of atmosphere is below 10 percent of the lower flammable limit; and (c) the residues are not capable of producings implies concentration than permissed by (b) above under existing atmosphere to orditions in the presented of the lower flammable invalided and the Marine Chemist's Cerelicate; and kether, that, (d) all adjacent spaces containing or having consented flammable or combustion existed where the lower tracked in the capable producing or the lower tracked in the lower tracked in the concentration of the lower tracked in the concentration of the lower tracked in the concentration of the lower tracked in the lower tracked on the late, or engine exotion or fire from the late and accordance. | time are as specified. <u>SAFE FORHOTH WORK</u> . Means that as the comparations of or where sidemal hot work is to be performed; and that, (b) (c) the residues are not capable of producings higher concer directed on the Marine Chemist a Carabase; and harber, it sufficiently prevent the preced of fee, on as assistantly. | the concentration of flammable in niration then permitted by (b) above that, (d) all adjacent mocces com- | s under existing atmospher zining or having cortained | ic conditions in the present I fammable or combustit | ce of fire, and while maintains to materials have been clos |
| SAFE FOR WORKERS: Means that in the compertment or space so designated (e) the oxygen content of the stroughers are within permissible concentrations; and that, (c) the residues are not capable of producing trade mister existing atmospheric conditions while maintains as directed on the Marine Chemistr's California. NOT SAFE FOR WORKERS: Means that in the compertment or space so designated, the requirements of Sate for Workers have not been miss. SAFE FOR WORKERS: Means that in the compertment or space so designated, the requirements of Sate for Workers have not been miss. SAFE FOR HOT WORK. Means that in the compertment so designated (e) oxygen content of the atmosphere is below 10 procent of the lower flammable missmalls in the atmosphere is below 10 percent of the lower flammable first and of where sitems in the percentage of the permission of its means that in the atmosphere is below 10 percent of the lower flammable first and (c) the residues are not capable of producings inglifer concentration their permission by (b) above under the stating stroughers conditions in the presence of ties, and white maintaine directed on the Marine Chemist's Certificate, and before their maintaine directed on the Marine Chemist's certificate, and white maintaine directed on the Marine Chemist's negativements. NOT SAFE FOR HOT WORK: Means that in the compertment is designated. The requirements of Safe for Hot Work have not been miss. SAFE FOR REPAIR YARD EXTRY: Means that the compertment is designated. The requirements of safe for yourse size designator (a) have been restard by sampfing at ren | time are as specified. SAFE FORHIDM, Means that at the comparament so or where seasonal not work is to be performed; and that, (b) (c) the residues are not capable of producings higher concest directed on the Marine Chemista Carallicate, and Justine; is sufficiently to prevent the spread of fire, or are squedictorily in the Marine Chemista's requirements. Marine Chemist's requirements. SAFE FOR REPAIR YARD ENTRY: Means that in the compartment of the compartment | ithe concentration of flammable in intension then permitted by (b) above that, (d) all adjacent spaces cont ented, or, in the case of but tents of sent so designated, the requirements and soaces of the flamma | e under existing atmospher aining or having contained r lube oil tanks, or engine ro nts of Safe for Hot Work he ble cryogenic fiquid carrier | ic conditions in the present filminimphie or combustit om or fire room bilges, havi we not been met. so designaset: (a) have b | os of life, and white maintaine to materials have been clea a been treated in accordance sen tested by sampling at ren |
| SAFE FOR WORKERS: Means that in the compertment or space so designated: (e) the oxygen content of the standard here is 15.5 percent by volume; and that, (b) the reactives are not capable of producing train: miterials under available content by contents and that, (c) the reactives are not capable of producing train: miterials under available management. NOT SAFE FOR WORKERS: Means that in the compartment or space so designated, the requirements of Sale for Workers have not been met. ENTER WITH RESTRICTIONS: Means that in any compartment or space so designated, entry for work may be made only it conditions of proper protective equipment, clothing, time are as specified. SAFE FOR HOT WORK. Means that in the compartment so designated (a) oxygen content of the atmosphere is a least 18.5 percent by volume, with the exception of inerted so or where several into the intent of the atmosphere is below 10 percent of the lower Rammable front and or where several producing a higher concentration of flammable materials in the atmosphere is below 10 percent of the lower Rammable front and (c) the readures are not capable of producing a higher concentration then permitted by (b) above under existing atmospheric conditions in the presence of tire, and white maintaine directed on the Marine Chemist's Cerebral Cambridge, and white maintaine directed on the Marine Chemist's a requirements. NOT SAFE FOR NOT WORK: Means that the compartment and appaces of the farmmable cryogens (squid carrier so designated. (a) have been research per sampling stations, and subtract the compartments and appaces of the farmmable cryogens. (squid carrier so designated. (a) have been instead by sampling at remaining stations, and subtracts the compartments and appaces of the farmmable cryogens. (squid carrier so designated. (a) have been instead to the lower flammable limit, or (b) are instead or (b) and instead of the lower flammable limit. Or (b) are instead or | time are as specified. SAFE FOR HOT WORK. Means that in the comparament so or where stemmal not work is to be performed; and that, (b) (c) the residues are not capable of producings higher concess directed on the Manner Chemists Carstaces; and Author, it sufficiently to prevent the spread of fire, or are saledectonly in the Marine Chemists and juverness; MOT SAFE FOR HOT WORK: Means that in the comparaments, and only the same shadows are comparated by the same shadows and results indicate the atmosphere tests controlled the same shadows. CHEMIST'S ENDORSCIMENT. This is to carrily stay in your CHEMIST'S ENDORSCIMENT. This is to carrily stay in your | He concentration of flammable in interson than permissed by (b) above that, (d) all adjacent spaces com- seried, or, in the case of fuel tanks of sent so designated. The requirement minerias and spaces of the flamma and to be above 19.5 percent | a under existing atmosphere siming or having contained in lube oil tanks, or engine no rits of Sale for Hot Work he ble cryogenic fiquid carrier- en, and less then 10 perce inces in the toragoing liet an | ic conditions in the present flummable or combustit om or fire room bilges, have we not been met. so designased (a) have be et of the lower flummable | os of fire, and white maintaine for materials have been clear a been treated in accordance sen lessed by sampling at rem limit, or (b) are inerted. |
| SAFE FOR WORKERS: Means that in the compertment or space an designated (a) the oxygen content of the stimosphere is at least 19.5 percent by volume; and that, (b) the reactives are not capable of producing train: mitted at under acutifing atmospheric conditions while maintain as directed on the flatates character Collections and that, (c) the reactives are not capable of producing train: mitted at under acutifing atmospheric conditions while maintain as directed on the flatates character Collections and its second on the flatates. NOT SAFE FOR WORKERS: Means that in the compartment or space so cleargnated, entry for work may be made only it conditions of proper protective equipment, clothing, then are as specified. SAFE FOR HOT WORK. Means that in the compartment or space so cleargnated, entry for work may be made only it conditions of proper protective equipment, clothing, then are as specified. SAFE FOR HOT WORK there shat in the compartment so designated (s) oxygen content of the atmosphere is below 10 percent of the lower Rammable trait. SAFE FOR HOT WORK there shat in the compartment are dejocated protecting a higher concentration of flatamable materials in the atmosphere is below 10 percent of the lower Rammable trait. (c) the reactures are not capable of producings higher concentration then permissed by (p) above under existing atmospheric conditions in the presence of tire, and white materials in the early expense of the lower the flatamatic formatics. And white, rise, (d) at adjacent space containing a thing contained flatamatic in the atmosphere is shad to present of the lower hashing at reactive to present the flatamatic limit. NOT SAFE FOR HOT WORK: Means that the compartment and spaces of the flatamatic entry so designated. (a) have been lessed by sampling at rear sampling statematics. And white the atmosphere is shad to be above 19.5 percent oxygen, and less than 10 percent of the lower flatamatic into (10) are invaried. CHEMIST'S BINDORSERIENT. This is to certify that I have personally det | time are as specified. SAFE FOR HOTMER. Means that as the comparament so or Where sidemnal hot work is to be performed; and that, (b) (c) the residues are not capable of producings highler concess directed on the Mariner Chemist's Carthager, and suther, is sufficiently to prevent the spread of fire, or are satisfactorily in the Marine Chemist's requirements. MOT SAFE FOR HOT WORK: Means that in the comparations of the same statements are repaired to the same statements are repaired to the same statements. SAFE FOR REPAIR YARD ENTRY: Means that the comparations of sach satisfactors and results indicate the atmosphere testing the same statements. This is to cerely that in have a Weessis and here bound the condition of each to be in according to the same statement. | the concentration of flammable in interaction than permitted by (b) above thet, (d) all adjacent places con- serted or, in the case of her tenha or sent so designated. The requirement ments and apaces of the flamma and to be above 19.5 percent oxy personally determined that all specialises with the sessioned designated 2.56 of MPPs All and. The | a under existing atmospher spining or having corealited ripbe oil talks, or engine in rits oil Sale for Hot Work he ble cryogerus liquid carrier en, and less then 10 perce noes in the foragoing list an ionnicase is besed on consist. | ic conditions in the present if thermaphe or combustitions or fire room briges, have see not been met. so designased: (a) have be st of the lower flammable is in accordance with AFPA analystance at the time the res | op of fire, and white maintaine the materials have been clear to a specific materials have been clear to a specific materials. The same fire and the same fire the same fire that the sa |